



**Department of Energy**

Argonne Area Office - West  
P.O. Box 2528  
Idaho Falls, Idaho 83403-2528

May 24, 2004

Mr. Daryl Koch  
Remediation Program Manager  
Idaho Department of Environmental Quality  
1410 North Hilton St.  
Boise, Idaho 83706

Mr. Nicholas Ceto  
INEEL Project Manager  
EPA Region 10  
712 Swift Blvd., Suite 5  
Richland, WA 99352

**SUBJECT: SUBMITTAL OF DRAFT FINAL EXPLANATION OF SIGNIFICANT  
DIFFERENCE FOR THE OPERABLE UNIT 9-04 RECORD OF DECISION**

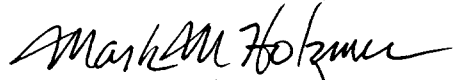
Dear Mr. Koch and Mr. Ceto:

Enclosed is the Draft Final Explanation of Significant Difference (ESD) for the September 29, 1998 Record of Decision (ROD) for the cleanup of inactive waste sites at ANL-W (Operable Unit 9-04). This ESD is required to inform the public of a change in the selected remedy for inactive waste sites at Argonne National Laboratory-West (ANL-W). This change involves excavating approximately 100 cubic yards of nonradioactive contaminated soils from portions of two ditch sites and disposing of the soil at the Central facilities Area Industrial Waste Landfill on the INEEL. The change also involves excavating approximately 926 cubic yards of radioactively-contaminated soil from the ANL-W Industrial Waste Pond and disposing of the soil in the INEEL CERCLA Disposal Facility (ICDF). The selected remedy in the ROD was to use cultivated plants to extract contaminants from all inactive waste sites at ANL-W (phytoremediation). The relatively high levels of remaining contaminants in portions of the two ditch portions preclude the use of phytoremediation at those particular locations. The Industrial Waste Pond is no longer feasible for phytoremediation as there is a potential for large clean cooling water discharges to the Pond in the 2005-2007 time frame.

Comments from EPA and IDHW on the draft ESD have been incorporated into this version of the ESD. If this version of the ESD is acceptable, please let our office know and we will forward an original signed by DOE to your staff for EPA and DEQ signature.

Please contact Greg Bass of DOE-ASO-W at 208-533-7184, if you have questions regarding this document.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark M. Holzner". The signature is fluid and cursive, with the first name "Mark" and last name "Holzner" clearly distinguishable.

Mark M. Holzner, Team Leader  
Argonne Site Office-West

Enclosure:  
As stated

cc: D. Funk, NE-40, w/o encl.  
K. Hain, NE-ID, w/encl.  
A. Harvey, ASO, w/o encl.  
S. Heston, DOE-CH, w/encl.  
M. Jeffers, IDEQ, w/encl.  
R. Lange, NE-70, w/o encl.  
S. Lee, ANL-W, w/encl.  
T. Miller, ANL-W, w/o encl.  
M. Wilkening, EPA Region 10, w/encl.